



Jeff Macy and Lynn Macy P.O.A. "In Pro Per"
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PLAINTIFFS IN PRO PER

THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA Eastern Division

Jeff Macy, as an individual, and Lynn
Macy, as an individual,

PLAINTIFF,

vs.

SAN BERNARDINO COUNTY CODE
ENFORCEMENT, a public entity, FIRE
ABATEMENT, a public entity, CSA18
SPECIAL DISTRICTS, a public entity,
JENNIFER BONNAR, as an individual,
SUZAN GARRIDO, as an individual, M.
SINNER, as an individual, P. MORENO, as
an individual, A. BROWN, as an
individual, M. ENRIQUEZ, as an
individual, GABRIEL ARROYO, as an
individual, S. WILD, as an individual, N.
CANDELARIO, as an individual, M.
FLORES, as an individual, D. WARD, as
an individual, ABRAHAM RAMIREZ, as an
individual, LAUREN ZAZUETA, as an
individual, JESSICA HEMSLEY, as an
individual, JESSICA RUIZ, as an
individual, ANDRES DIAZ, as an
individual and in his official capacity as
a supervisor, OFFICER AMBER SCHARF,
as an individual and in his official
capacity as a supervisor, DANIELLE
MCMAHON, as an individual, PHILIP
SALAZAR, as an individual and in his
official capacity as a supervisor, IRENE
ROMERO, as an individual, ADRIANNA
WIMENTA, as an individual, IAN
SALDIVAR, as an individual, CRYSTAL
CHAVEZ-JONES, as an individual,
ANTHONY PHAM, P.E., as an individual,
MICHELE MARTIN, as an individual,
MELISSA CHAPMAN, as an individual,
BRENDON BIGGS, M.S., P.E., as an
individual and in his official capacity as
a director, DAVID DOUBLET, M.S., P.E., as
an individual and in his official capacity

Case No.: 5:23-cv-00558-
JGB-BFM

**143533 (Code
Enforcement) and 143546 (CSA-18).**

COMPLAINT FOR
DAMAGES AND DEMAND FOR JURY
TRIAL FOR:

(1) Trespassing.

(2) Harassment.

(3) Discrimination.

(4) Cover up.

(5) Undue burden upon
homeowners with undue service.

(6) Unelected officials creating laws
that go against federal and state
constitutions, laws.

(7) Theft.

(8) Unreasonable search,

(9) Municipal and

Supervisory Liability (42 U.S.C. § 1983).

(10) Intentional infliction of
Emotional Distress.

(11) Violation of Bane Act.

(12) Excessive Fines.

**DEMAND FOR JURY
TRIAL**

as an assistant director, GRANVILLE M. BOWMAN, as an individual and in his official capacity as a director, KATHLEEN BINGHAM, as an individual, DENA SMITH, as an individual, TRACY A. SWEENEY, as an individual, DARREN MEEKA, as an individual, VICTOR TORDESILLAS, as an individual and in his official capacity as a director, SOPHIA SALAS, as an individual, GLENN JACKLIN, as an individual and in his official capacity as a CSA-18 supervisor, RUDY GUERRERO, as an individual and in his official capacity as a CSA-18 supervisor, ALEXANDRA CALDERON, as an individual, ALDAIR JIMENEZ, as an individual, PAM ADAMS, as an individual and in his official capacity as a supervisor, JOHN BRADFORD, as an individual and in his official capacity as a CSA-18 supervisor, BRANDON SORBY, as an individual and in his official capacity as a CSA-18 supervisor, ADENA LOZANO, as an individual, OFFICER GRIM, as an individual, GABRIEL GARCIA, as an individual, CODE ENFORCEMENT OFFICERS et al. as individuals, and DOES 1-50.

Defendants.

PLAINTIFF JEFF MACY and LYNN MACY, through their undersigned counsel, hereby files this Complaint against Defendants San Bernardino County Code Enforcement, Fire abatement, CSA18 Special Districts, Code Enforcement Officers et al., CSA18 Special Districts, Jennifer Bonnar, Suzan Garrido, M. Sinner, P. Moreno, A. Brown, M. Enriquez, Gabriel Arroyo, S. Wild, N. Candelario, M. Flores, D. Ward, Abraham Ramirez, Lauren Zazueta, Jessica Hemsley, Jessica Ruiz, Andres Diaz, Officer Amber Scharf, Danielle McMahon, Philip Salazar, Irene Romero, Adrianna Wimenta, Ian Saldivar, Crystal Chavez-Jones, Anthony Pham, P.E., Michele Martin, Melissa Chapman, Brendon Biggs, M.S., P.E., David Doublet, M.S., P.E., Granville M. Bowman, Kathleen Bingham, Dena Smith, Tracy A. Sweeney, Darren Meeka, Victor Tordesillas, Sophia Salas, Glenn Jacklin, Rudy

Guerrero, Alexandra Calderon, Aldair Jimenez, Pam Adams, John Bradford, Brandon Sorby, Adena Lozano, Officer Grim, Gabriel Garcia, and Does 1 to 50, inclusive (collectively "Defendants"), alleges as follows:

JURISDICTION AND VENUE

1. This Court has original jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343(a)(3-4) because Plaintiffs assert claims arising under the laws of the United States including 42 U.S.C. §§ 1983, 1985 & 1988, the Fourth & Fourteenth Amendments of the United States Constitution. This court has supplemental jurisdiction over state law claims pursuant to 28 USC § 1367 because those claims are so related to PLAINTIFF'S federal claims that the claims form part of the same case and/or controversy pursuant to Article III of the United States Constitution.
2. Venue is properly founded in this judicial district pursuant to 28 USC §§ 1391(b) and (c) in that a substantial part of the events giving rise to the claims in this action occurred within this District and Defendants are subject to personal jurisdiction in this district.

PARTIES

3. PLAINTIFF JEFF MACY, is a citizen of the State of California, and at all relevant times herein was a resident in San Bernardino County in the State of California.
4. PLAINTIFF LYNN MACY, is a citizen of the State of California, and at all relevant times herein was a resident in San Bernardino County in the State of California.

- 1 5. Defendant San Bernardino County Code Enforcement is and at all times
2 relevant a public entity located in the County of San Bernardino and
3 existing under the laws of the State of California.
- 4 6. Defendant Fire Abatement is and at all times relevant a public entity
5 located in the County of San Bernardino and existing under the laws of
6 the State of California.
- 7 7. Defendant CSA18 Special Districts is and at all times relevant a public
8 entity located in the County of San Bernardino and existing under the laws
9 of the State of California.
- 10 8. Defendant Code Enforcement Officers et al. is and at all times relevant
11 were residents of the County of San Bernardino and are sued in their
12 individual capacity.
- 13 9. On information and belief, Defendants Jennifer Bonnar, Suzan Garrido, M.
14 Sinner, P. Moreno, A. Brown, M. Enriquez, Gabriel Arroyo, S. Wild, N.
15 Candelario, M. Flores, D. Ward, Abraham Ramirez, Lauren Zazueta, Jessica
16 Hemsley, Jessica Ruiz, Andres Diaz, Officer Amber Scharf, Danielle
17 McMahon, Philip Salazar, Irene Romero, Adrianna Wimenta, Ian Saldivar,
18 Crystal Chavez-Jones, Anthony Pham, P.E., Michele Martin, Melissa
19 Chapman, Brendon Biggs, M.S., P.E., David Doublet, M.S., P.E., Granville M.
20 Bowman, Kathleen Bingham, Dena Smith, Tracy A. Sweeney, Darren
21 Meeka, Victor Tordesillas, Sophia Salas, Glenn Jacklin, Rudy Guerrero,
22 Alexandra Calderon, Aldair Jimenez, Pam Adams, John Bradford,
23 Brandon Sorby, Adena Lozano, Officer Grim, and Gabriel Garcia are and
24 at all times relevant were residents of the County of San Bernardino and
25 are sued in their individual capacity.
26
27
28

1 10. On information and belief at all times relevant, Defendant DOES 1-50 were
2 residents of the County of San Bernardino and are sued in their individual
3 capacity.
4

5 **FACTS COMMON TO ALL CAUSES OF ACTION**

6 11. Each and every allegation set forth in each and every averment and
7 allegation of this pleading hereby is incorporated by this reference in
8 each and every averment and allegation of this pleading.

9 12. I am informed and believe that Defendants Code enforcement, CSA-18,
10 Fire Abatement, Waste Management, and San Bernardino County Public
11 Records has not provided any of my public records requests.

12 13. I am informed and believe that Defendants CSA-18 has intentionally
13 deprived the interest of the Plaintiff's property through the unauthorized
14 act (Trespassing on Plaintiff's private property, not allowing Plaintiffs to
15 drive due to failure to repair roads) and causing loss. The default remedy is
16 the damages, considering the fair market value of the property or
17 returning the property. Since 2021 until today, Plaintiffs discovered on
18 2/27/2023 that Defendants CSA-18 factually did not file Plaintiffs complaint
19 or claim against Defendants CSA-18 with County of San Bernardino Risk
20 Management, which Defendants CSA-18 claimed to have filed back in
21 2021. 2 months later Defendants CSA-18 said Risk Management denied
22 Plaintiffs claim, without giving Plaintiffs any paperwork to prove it or even
23 a case number. Defendants District CSA-18 have admitted to damaging
24 Plaintiffs property to the Police, but the Police Officer refused to prosecute
25 Defendants saying, "We don't normally arrest county officials".
26 Defendants CSA-18 took down Plaintiffs cables, which caused all glass
27 lights to be broken and left the broken glass all over Plaintiffs private road
28

1 (destruction of private property California Penal Code § 594 PC).

2 Defendants CSA-18 have been dumping base rock, trash, waterflow, and
3 water pipes on Plaintiffs property for years without permission. Defendants
4 CSA-18 have stolen Plaintiffs 2x2 in. signs that held up the chain across
5 MacyLand. Roughly 75-100 yards onto Plaintiffs property, Defendants CSA-
6 18 took down another "No Trespassing, Kids at Play" sign. Defendants
7 CSA-18 also cut down tree branches to remove Plaintiffs 5/8" chain, stole
8 fences (Penal Code § 487 PC) that were chained and locked to Plaintiffs
9 tree. Defendants CSA-18 unbolted and took down Plaintiffs 3/8" chain to
10 the Yeshua planned temple site. Defendants CSA-18 won't repair Burnt
11 Mill Canyon Road, which they are responsible to repair, claiming
12 Defendants cannot afford to fix the road.
13

14 14. I am informed and believe that failure or omission to perform the duty of
15 Defendants CSA-18 to maintain Burnt Mill Canyon Rd, is clearly
16 discriminatory & saves the Defendants County money. Harm sustained by
17 the Plaintiffs was intentional & unjustified. Plaintiffs have not been able to
18 drive to lower property to clear trash neighbors dumped. Plaintiffs have
19 had to walk miles to get to their property to perform demolitions and trash
20 removal. Defendants CSA-18 hates Plaintiffs for complaining about
21 Defendants failures to fix roads & for telling Defendants to fix the cable
22 gate the Defendants stole and to pay damages for the lights, cables,
23 signs, posts, and bolts, Defendants CSA-18 damaged and/or stole.
24 Plaintiffs are at constant risk of getting towed by parking at the last part of
25 the drivable road. Failure to perform the duty or the negligent act of the
26 Defendant CSA-18, which subsequently results in the cause of action in
27 the suit.
28

1 15. I am informed and believe that Defendants Elderly Abuse Plaintiff Lynn
2 Macy 84-year-old elderly woman by giving constant notices, trespassing
3 onto Plaintiffs property, and constantly reporting trash in front of Plaintiffs
4 trash cans or leaves on Plaintiffs roof to harass Plaintiffs. Defendant Code
5 Enforcement Officers already trespassed into Plaintiffs home twice and
6 forced Plaintiffs to get a permit for a preexisting structure in Plaintiffs home
7 to raise Plaintiffs property taxes unjustly. For 18 years Plaintiffs have been
8 getting unfounded Code violation notices. California Penal Code § 368
9 PC defines elder abuse as the physical or emotional abuse, neglect, or
10 financial exploitation of a victim 65 years of age or older.
11

12 16. I am informed and believe that Defendants Code Enforcement is against
13 Cal Fire's pretense laws and has given Plaintiffs a notice to move wood 30
14 feet away from all structures, despite there being a fire-resistant tarp
15 covering the wood. Cal Fire's notice of defensible space inspection states
16 in Zone 1 section G. to relocate exposed wood piles outside of Zone 1
17 unless completely covered in a fire-resistant material, pursuant to 14 CCR
18 § 1299.03(a)(3). Cal. Code Regs. Tit. 14, § 1299.03 – Requirements (a)(3)
19 Relocate exposed firewood piles outside of Zone 1 unless they are
20 completely covered in a fire-resistant material. Zone 1 being within 30 feet
21 of a structure. Defendants Code Enforcement is going against Cal Fire
22 which supersedes Defendants Code Enforcement since it is a state
23 agency while Defendant Code Enforcement is only county.
24

25 17. There's an important legal principle that says "ignorance of the law is no
26 excuse." You can't defend your actions by arguing you didn't know they
27 were illegal, even if you honestly did not realize you were breaking the
28 law.

FIRST CAUSE OF ACTION

Unreasonable Search

(By Plaintiff Against San Bernardino County Code Enforcement)

18. Plaintiff hereby re-alleges and incorporates by this reference, as though set forth in full, the allegations in paragraph 1 through 17, inclusive.

19. As a result of the conduct of Code Enforcement Officers et al. they are liable because they were integral participants in the wrongful entry and inspection or because they failed to intervene to prevent these violations.

20. Defendant Code Enforcement Officers already trespassed into Plaintiffs home twice and forced Plaintiffs to get a permit for a preexisting structure in Plaintiffs home to raise Plaintiffs property taxes unjustly.

21. Plaintiffs Jeff Macy and Lynn Macy also claims attorney fees and costs pursuant to 42 U.S.C. § 1988 under this claim for relief.

SECOND CAUSE OF ACTION

Municipal and Supervisory Liability (42. U.S.C. § 1983)

(By Plaintiff Against San Bernardino County Code Enforcement, Fire abatement, CSA18 Special Districts, Code Enforcement Officers et al. and Does 1-50.)

22. Plaintiff hereby re-alleges and incorporates by this reference, as though set forth in full, the allegations in paragraph 1 through 21, inclusive.

23. On and for some time prior to 2021 (and continuing to the present date) Defendants San Bernardino County Code Enforcement, Fire abatement, CSA18 Special Districts, Code Enforcement Officers et al., and Does 1 to 50, deprived Plaintiffs Jeff Macy and Lynn Macy of the rights and liberties secured to them by the 4th and 14th Amendments to the United States Constitution, in that said defendants and their supervising and managerial

1 employees, agents, and representatives acting with gross negligence and
2 with reckless and deliberate indifference to the safety, rights, and liberties
3 of the public in general and of Jeff Macy and Lynn Macy, and of persons
4 in their class, situation and comparable position, in particular, knowingly
5 maintained, enforced and applied an official recognized custom, policy,
6 and practice of:

7 (a) Employing and retaining as county officials and other personnel,
8 including Code Enforcement, Fire Abatement, CSA18 Special
9 Districts, Jennifer Bonnar, Suzan Garrido, M. Sinner, P. Moreno, A.
10 Brown, M. Enriquez, Gabriel Arroyo, S. Wild, N. Candelario, M.
11 Flores, D. Ward, Abraham Ramirez, Lauren Zazueta, Jessica
12 Hemsley, Jessica Ruiz, Andres Diaz, Officer Amber Scharf,
13 Danielle McMahon, Philip Salazar, Irene Romero, Adrianna
14 Wimenta, Ian Saldivar, Crystal Chavez-Jones, Anthony Pham,
15 P.E., Michele Martin, Melissa Chapman, Brendon Biggs, M.S., P.E.,
16 David Doublet, M.S., P.E., Granville M. Bowman, Kathleen
17 Bingham, Dena Smith, Tracy A. Sweeney, Darren Meeka, Victor
18 Tordesillas, Sophia Salas, Glenn Jacklin, Rudy Guerrero,
19 Alexandra Calderon, Aldair Jimenez, Pam Adams, John
20 Bradford, Brandon Sorby, Adena Lozano, Officer Grim, Gabriel
21 Garcia, and Unknown Does 1-50 at all times material herein
22 knew or reasonably should have known had propensities for
23 abusing their authority and for mistreating citizens by failing to
24 follow their County Policies;

25 (b) Inadequately supervising, training, controlling, assigning and
26 disciplining Code Enforcement officers and other personnel,
27
28

1 including Code Enforcement, Fire Abatement, CSA18 Special
2 Districts, Jennifer Bonnar, Suzan Garrido, M. Sinner, P. Moreno, A.
3 Brown, M. Enriquez, Gabriel Arroyo, S. Wild, N. Candelario, M.
4 Flores, D. Ward, Abraham Ramirez, Lauren Zazueta, Jessica
5 Hemsley, Jessica Ruiz, Andres Diaz, Officer Amber Scharf,
6 Danielle McMahon, Philip Salazar, Irene Romero, Adrianna
7 Wimenta, Ian Saldivar, Crystal Chavez-Jones, Anthony Pham,
8 P.E., Michele Martin, Melissa Chapman, Brendon Biggs, M.S., P.E.,
9 David Doublet, M.S., P.E., Granville M. Bowman, Kathleen
10 Bingham, Dena Smith, Tracy A. Sweeney, Darren Meeka, Victor
11 Tordesillas, Sophia Salas, Glenn Jacklin, Rudy Guerrero,
12 Alexandra Calderon, Aldair Jimenez, Pam Adams, John
13 Bradford, Brandon Sorby, Adena Lozano, Officer Grim, Gabriel
14 Garcia, and Does 1-50 each knew or in the exercise of
15 reasonable care should have known the aforementioned
16 propensities and character traits;

17
18 (c) Maintaining grossly inadequate procedures for reporting,
19 supervising, investigating, reviewing, controlling and disciplining
20 the intentional conduct by Code Enforcement officers and other
21 personnel, Fire Abatement, CSA18 Special Districts, Jennifer
22 Bonnar, Suzan Garrido, M. Sinner, P. Moreno, A. Brown, M.
23 Enriquez, Gabriel Arroyo, S. Wild, N. Candelario, M. Flores, D.
24 Ward, Abraham Ramirez, Lauren Zazueta, Jessica Hemsley,
25 Jessica Ruiz, Andres Diaz, Officer Amber Scharf, Danielle
26 McMahon, Philip Salazar, Irene Romero, Adrianna Wimenta, Ian
27 Saldivar, Crystal Chavez-Jones, Anthony Pham, P.E., Michele
28

1 Martin, Melissa Chapman, Brendon Biggs, M.S., P.E., David
2 Doublet, M.S., P.E., Granville M. Bowman, Kathleen Bingham,
3 Dena Smith, Tracy A. Sweeney, Darren Meeka, Victor Tordesillas,
4 Sophia Salas, Glenn Jacklin, Rudy Guerrero, Alexandra Calderon,
5 Aldair Jimenez, Pam Adams, John Bradford, Brandon Sorby,
6 Adena Lozano, Officer Grim, Gabriel Garcia, and Unknown Does
7 1-50, including Does 1-50.
8

- 9 (d) Failing to adequately train Code Enforcement officers including
10 Defendants Code Enforcement, Fire Abatement, CSA18 Special
11 Districts, Jennifer Bonnar, Suzan Garrido, M. Sinner, P. Moreno, A.
12 Brown, M. Enriquez, Gabriel Arroyo, S. Wild, N. Candelario, M.
13 Flores, D. Ward, Abraham Ramirez, Lauren Zazueta, Jessica
14 Hemsley, Jessica Ruiz, Andres Diaz, Officer Amber Scharf,
15 Danielle McMahon, Philip Salazar, Irene Romero, Adrianna
16 Wimenta, Ian Saldivar, Crystal Chavez-Jones, Anthony Pham,
17 P.E., Michele Martin, Melissa Chapman, Brendon Biggs, M.S., P.E.,
18 David Doublet, M.S., P.E., Granville M. Bowman, Kathleen
19 Bingham, Dena Smith, Tracy A. Sweeney, Darren Meeka, Victor
20 Tordesillas, Sophia Salas, Glenn Jacklin, Rudy Guerrero,
21 Alexandra Calderon, Aldair Jimenez, Pam Adams, John
22 Bradford, Brandon Sorby, Adena Lozano, Officer Grim, Gabriel
23 Garcia, and Does 1-50 and failing to institute appropriate
24 policies regarding constitutional procedures and practices;
25 (e) Having and maintaining an unconstitutional policy, customs,
26 procedures of using excessive trespassing which is also
27 demonstrated by inadequate training regarding these subjects.
28

1 24. Defendants San Bernardino County Code Enforcement, Fire abatement,
2 CSA18 Special Districts, Code Enforcement Officers et al. and Does 1-50,
3 together with various other officials whether named or unnamed, had
4 either actual or constructive knowledge of the deficient policies,
5 practices and customs alleged in the paragraphs above. Despite having
6 knowledge as stated above these Defendants condone, tolerated, and
7 through actions and inactions thereby ratified such policies. Said
8 Defendants also acted with deliberate indifference to the foreseeable
9 effects and consequences of these policies with respect to the
10 constitutional rights of Jeff Macy and Lynn Macy and other individuals
11 similarly situated.
12

13 25. By perpetrating, sanctioning, tolerating and ratifying the outrageous
14 conduct and wrongful acts, Defendants San Bernardino County Code
15 Enforcement, Fire abatement, CSA18 Special Districts, Code Enforcement
16 Officers et al., Jennifer Bonnar, Suzan Garrido, M. Sinner, P. Moreno, A.
17 Brown, M. Enriquez, Gabriel Arroyo, S. Wild, N. Candelario, M. Flores, D.
18 Ward, Abraham Ramirez, Lauren Zazueta, Jessica Hemsley, Jessica Ruiz,
19 Andres Diaz, Officer Amber Scharf, Danielle McMahon, Philip Salazar,
20 Irene Romero, Adrianna Wimenta, Ian Saldivar, Crystal Chavez-Jones,
21 Anthony Pham, P.E., Michele Martin, Melissa Chapman, Brendon Biggs,
22 M.S., P.E., David Doublet, M.S., P.E., Granville M. Bowman, Kathleen
23 Bingham, Dena Smith, Tracy A. Sweeney, Darren Meeka, Victor Tordesillas,
24 Sophia Salas, Glenn Jacklin, Rudy Guerrero, Alexandra Calderon, Aldair
25 Jimenez, Pam Adams, John Bradford, Brandon Sorby, Adena Lozano,
26 Officer Grim, Gabriel Garcia, and Does 1-50, acted with intentional,
27 reckless, and callous disregard for the safety and constitutional rights of
28

1 Jeff Macy and Lynn Macy. Defendants San Bernardino County Code
2 Enforcement, Fire abatement, CSA18 Special Districts, Code Enforcement
3 Officers et al. and Does 1-50, and each of their actions were willful,
4 wanton, oppressive, malicious, fraudulent, extremely offensive, and
5 unconscionable to any reasonable person of normal sensibilities.

6
7 26. By reason of the aforementioned policies and practices of Defendants
8 San Bernardino County Code Enforcement, Fire abatement, CSA18
9 Special Districts, Code Enforcement Officers et al., Jennifer Bonnar, Suzan
10 Garrido, M. Sinner, P. Moreno, A. Brown, M. Enriquez, Gabriel Arroyo, S.
11 Wild, N. Candelario, M. Flores, D. Ward, Abraham Ramirez, Lauren
12 Zazueta, Jessica Hemsley, Jessica Ruiz, Andres Diaz, Officer Amber Scharf,
13 Danielle McMahon, Philip Salazar, Irene Romero, Adrianna Wimenta, Ian
14 Saldivar, Crystal Chavez-Jones, Anthony Pham, P.E., Michele Martin,
15 Melissa Chapman, Brendon Biggs, M.S., P.E., David Doublet, M.S., P.E.,
16 Granville M. Bowman, Kathleen Bingham, Dena Smith, Tracy A. Sweeney,
17 Darren Meeka, Victor Tordesillas, Sophia Salas, Glenn Jacklin, Rudy
18 Guerrero, Alexandra Calderon, Aldair Jimenez, Pam Adams, John
19 Bradford, Brandon Sorby, Adena Lozano, Officer Grim, Gabriel Garcia,
20 and Does 1-50, acted with intentional, reckless and callous disregard for
21 the safety and constitutional rights of Jeff Macy and Lynn Macy.
22 Defendants San Bernardino County Code Enforcement, Fire abatement,
23 CSA18 Special Districts, Code Enforcement Officers et al. and Does 1-50,
24 Jeff Macy and Lynn Macy incurred damages in the form of psychological
25 and emotional injuries, including, without limitation, pain and suffering,
26 sleep deprivation, humiliation, all of which are continuing and damaging
27 to reputation. Plaintiff's actual damages will be ascertained at trial.

27. The policies, practices and customs implemented and maintained and still tolerated by Defendants San Bernardino County Code Enforcement, Fire abatement, CSA18 Special Districts, Code Enforcement Officers et al., Jennifer Bonnar, Suzan Garrido, M. Sinner, P. Moreno, A. Brown, M. Enriquez, Gabriel Arroyo, S. Wild, N. Candelario, M. Flores, D. Ward, Abraham Ramirez, Lauren Zazueta, Jessica Hemsley, Jessica Ruiz, Andres Diaz, Officer Amber Scharf, Danielle McMahon, Philip Salazar, Irene Romero, Adrianna Wimenta, Ian Saldivar, Crystal Chavez-Jones, Anthony Pham, P.E., Michele Martin, Melissa Chapman, Brendon Biggs, M.S., P.E., David Doublet, M.S., P.E., Granville M. Bowman, Kathleen Bingham, Dena Smith, Tracy A. Sweeney, Darren Meeka, Victor Tordesillas, Sophia Salas, Glenn Jacklin, Rudy Guerrero, Alexandra Calderon, Aldair Jimenez, Pam Adams, John Bradford, Brandon Sorby, Adena Lozano, Officer Grim, Gabriel Garcia, and Does 1-50, acted with intentional, reckless and callous disregard for the safety and constitutional rights of Jeff Macy and Lynn Macy. Defendants San Bernardino County Code Enforcement, Fire abatement, CSA18 Special Districts, Code Enforcement Officers et al. and Does 1-50, were affirmatively linked to and were significantly influential forces of Plaintiffs Jeff Macy and Lynn Macy.

28. Plaintiffs Jeff Macy and Lynn Macy also claims attorney fees and costs pursuant to 42 U.S.C. § 1988 under this claim for relief.

THIRD CAUSE OF ACTION

Intentional Infliction of Emotional Distress

(By Plaintiff Against All Defendants)

1 29. Plaintiff hereby re-alleges and incorporates by this reference, as though
2 set forth in full, the allegations in paragraph 1 through 28, inclusive.

3 30. Plaintiff is informed and believes and thereon alleges that Defendants'
4 actions described in this Complaint were intentional, extreme, and
5 outrageous.

6 31. Plaintiff is further informed and believes and hereon alleges that such
7 actions were done with intent to cause serious emotional distress and
8 were done with reckless disregard of the probability of causing Plaintiffs
9 serious emotional distress.

10 32. As a proximate result of the Defendants actions Plaintiffs Jeff Macy and
11 Lynn Macy incurred damages in the form of psychological and emotional
12 injuries, including, without limitation, pain and suffering, sleep deprivation,
13 humiliation, all of which are continuing and damaging to reputation.
14 Plaintiff's actual damages will be ascertained at trial.

15 33. The conduct of the Defendants was despicable, malicious, wanton,
16 oppressive and accomplished with a conscious disregard for Plaintiffs Jeff
17 Macy and Lynn Macy's rights, entitling Plaintiffs Jeff Macy and Lynn Macy
18 to an award of exemplary and punitive damages.

19 34. Plaintiffs Jeff Macy and Lynn Macy also claims attorney fees and costs
20 pursuant to 42 U.S.C. § 1988 under this claim for relief.
21

22
23 **FOURTH CAUSE OF ACTION**

24 **Violation of Bane Act (Cal. Civ. Code § 52.1)**

25 **(By Plaintiff Against All Defendants)**

26 35. Plaintiff hereby re-alleges and incorporates by this reference, as though
27 set forth in full, the allegations in paragraph 1 through 34, inclusive.
28

1 36. Defendant intentionally interfered with Plaintiff's civil rights by threats,
2 intimidation, or coercion in that Defendants acted violently against
3 Plaintiffs Jeff Macy and Lynn Macy from exercising their right to
4 unreasonable search by trespassing into their home.

5 37. Plaintiffs Jeff Macy and Lynn Macy also claims attorney fees and costs
6 pursuant to 42 U.S.C. § 1988 under this claim for relief.
7

8
9 **FIFTH CAUSE OF ACTION**

10 **Forced Demolition Permit**

11 **(By Plaintiff Against County Code Enforcement et al.)**

12 38. Plaintiff hereby re-alleges and incorporates by this reference, as though
13 set forth in full, the allegations in paragraph 1 through 37, inclusive.

14 39. Defendant's County Code Enforcement et al. forced Plaintiffs to get a
15 demolition permit.

16 40. At Plaintiffs property APN# 0342-031-01 a demolition permit was required
17 for a house that was already demolished costing \$266. Defendants
18 County told Plaintiffs they had to get another demolition permit for a
19 building that was demolished before Plaintiffs could buy the property,
20 trying to extort more money. Under the fourth amendment the U.S.
21 constitution grants the right to be free from unreasonable searches and
22 seizures. The Defendants Code Enforcement Officers were informed that
23 they were walking on private property. Defendants Code Enforcement
24 Officers did not have a search warrant to enter Plaintiffs private property.

25 41. Plaintiffs Jeff Macy and Lynn Macy also claims attorney fees and costs
26 pursuant to 42 U.S.C. § 1988 under this claim for relief.
27

SIXTH CAUSE OF ACTION

Forced Address

(By Plaintiff Against County Code Enforcement et al.)

42. Plaintiff hereby re-alleges and incorporates by this reference, as though set forth in full, the allegations in paragraph 1 through 41, inclusive.

43. Defendant's County Code Enforcement et al. forced Plaintiffs to pay for an address or the Defendants would not remove the notice from the building and safety department division. Plaintiffs were also not allowed to customize the address. Plaintiffs were forced to pay for something they did not want.

44. Plaintiffs Jeff Macy and Lynn Macy also claims attorney fees and costs pursuant to 42 U.S.C. § 1988 under this claim for relief.

SEVENTH CAUSE OF ACTION

Trespassing without Warrant

(By Plaintiff Against All Defendants)

45. Plaintiff hereby re-alleges and incorporates by this reference, as though set forth in full, the allegations in paragraph 1 through 44, inclusive.

46. Defendants Health Department interfered with Plaintiff's civil rights by intimidation or coercion in that Defendant acted violently against Plaintiffs Jeff Macy and Lynn Macy from exercising their right to unreasonable search by trespassing onto their property without warrant for potential well.

47. Plaintiffs Jeff Macy and Lynn Macy also claims attorney fees and costs pursuant to 42 U.S.C. § 1988 under this claim for relief.

EIGHTH CAUSE OF ACTION

Failure to do Public Records Request

(By Plaintiff Against All Defendants)

48. Plaintiff hereby re-alleges and incorporates by this reference, as though set forth in full, the allegations in paragraph 1 through 47, inclusive.

49. Defendants failed to do a public records request as requested by Plaintiffs.

50. California Public Records Act Information (CPRA) The Act provides for two types of access. One is a right to inspect public records: "Public records are open to inspection at all times during the office hours of the state or local agency and every person has a right to inspect any public record, except as hereafter provided."

51. Plaintiffs Jeff Macy and Lynn Macy also claims attorney fees and costs pursuant to 42 U.S.C. § 1988 under this claim for relief.

NINTH CAUSE OF ACTION

Excessive Fines

(By Plaintiff Against All Defendants)

52. Plaintiff hereby re-alleges and incorporates by this reference, as though set forth in full, the allegations in paragraph 1 through 51, inclusive.

53. Defendants have been excessively giving fines for trash in front of trash cans, leaves on the roof, yard, and firewood.

54. Plaintiffs Jeff Macy and Lynn Macy also claims attorney fees and costs pursuant to 42 U.S.C. § 1988 under this claim for relief.